

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

MARCUS ANTHONY DELGADO,

Plaintiff,

vs.

HONEYWELL INTERNATIONAL, INC.
d.b.a. HONEYWELL AEROSPACE, a
Delaware corporation,

Defendant.

Case No. 2:19-cv-00395-BJR

**STIPULATED MOTION AND ORDER
TO EXTEND DEADLINES**

STIPULATION

The parties hereby file this stipulated motion pursuant to LCR 7(d)(1) and LCR 10(g) to move for a stipulated extension of the remaining deadlines in this case by 60 days.

The parties respectfully request that the deadlines be extended in this case based upon the significant amount of time it has taken to receive relevant and needed medical records related to Plaintiff and his allegations and damages, as well as the fact that Plaintiff's counsel's father recently passed away requiring him to be out of the state tending to family matters. These issues have made finishing and finalizing discovery extremely difficult and thus, the parties require more time to ensure the case is properly litigated. Allowing for such additional time will not unduly delay or prejudice either party.

WHEREFORE, the parties jointly request that the Court extend the deadline as detailed

1 above for good cause shown.

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3 Respectfully Submitted,

4 Dated: December 19, 2019.

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6 LAW OFFICE OF J.D. SMITH, PLLC

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

7 /s/ J.D. Smith (with permission)

/s/ Jaime N. Cole

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16 *Attorneys for Defendant*

ORDER

PURSUANT TO JOINT MOTION, IT IS SO ORDERED that the remaining deadlines in this case are moved out by 60 days.

DATED this 19th day of December, 2019.


The Honorable Barbara J. Rothstein